

# Fact Sheet



## For Draft/Proposed Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: **R30-09900100-2010**  
Application Received: **February 5, 2010**  
Plant Identification Number: **099-00100**  
Permittee: **Marathon Petroleum Company**  
Facility Name: **Kenova Marine Terminal**  
Mailing Address: **P.O. Box 83, Kenova, WV 25530**

*Revised N/A*

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Physical Location: Kenova, Wayne County, West Virginia  
UTM Coordinates: 361.32 km Easting • 4251.68 km Northing • Zone 17  
Directions: From Charleston, travel I-64 West to the Ceredo/Kenova exit. Take Highway 75 North to Route 60 West. Turn right onto 21<sup>st</sup> Street, then left on Beech Street. Storage tank farm on left, second black top road to the right and through flood wall is the office and barge loading.

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### Facility Description

The Kenova Marine Terminal is a bulk gasoline terminal covered by Standard Industrial Classification (SIC) 4491. The station has the potential to operate seven (7) days per week, twenty-four (24) hours per day and fifty-two (52) weeks per year. The station consists of four (4) internal floating roof gasoline storage tanks, two (2) fixed cone roof #2 fuel oil storage tanks, and three (3) internal floating roof gasoline/#2 fuel oil/kerosene storage tanks. The station receives, ships and stores petroleum products via barges.

### Emissions Summary

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Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2008 Actual Emissions
Volatile Organic Compounds (VOC)	225.47	30.54

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Hazardous Air Pollutants	Potential Emissions	2008 Actual Emissions
Benzene	3.708	0.21
Ethylbenzene	2.889	0.03
Hexane	2.060	0.37
Toluene	14.458	0.30
Trimethylpentane (2,2,4)	1.646	0.19
Xylene	14.542	0.16

*Some of the above HAPs may be counted as VOCs.*

### Title V Program Applicability Basis

This facility has the potential to emit 225.47 tons per year of VOCs and 14.5 tons per year each of Toluene and Xylene. Due to this facility's potential to emit over 100 tons per year of a criteria pollutant, over 10 tons per year of a single HAP, and over 25 tons per year of aggregate HAPs, Marathon Petroleum Company's Kenova Marine Terminal is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

### Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

This facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR6	Open burning prohibited.
	45CSR11	Standby plans for emergency episodes.
	45CSR13	Preconstruction permit
	45CSR21	Internal/external floating roof storage tank requirements
	WV Code §22-5-4(a)(14)	The Secretary may request any pertinent information such as annual emission inventory reporting.
	45CSR30	Operating permit requirement.
	40 CFR Part 60, Subpart Kb	Requirements for volatile organic liquid storage vessels.
	40 CFR Part 61	Asbestos inspection and removal.
	40 CFR Part 63, Subpart R	Gasoline Distribution Facility requirements.
	40 CFR Part 63, Subpart Y	Marine Tank Vessel Loading Operations requirements.
State Only:	45CSR4	No objectionable odors.
	45CSR42	Greenhouse Gas Emissions Inventory Program

Each State and Federally-enforceable condition of the draft Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the draft Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the draft Title V permit as such.

The Secretary's authority to require standards under 40 CFR Part 60 (NSPS), 40 CFR Part 61 (NESHAPs), and 40 CFR Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

### Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit ( <i>if any</i> )
R13-2277A	June 1, 2004	
CO-BGT-R21-94-11	July 15, 1994	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table B," which may be downloaded from DAQ's website.

### Determinations and Justifications

This is a renewal of the Title V permit originally issued in 2000 and renewed in 2005. The following are changes made to the most recent permit.

Section 5.0. of the permit lists the requirements of 40 CFR Part 63, subpart Y. This section was reformatted to be consistent with the Title V Permit format. Conditions in the 2005 renewal permit that stated "Not Applicable" were removed (i.e. §§ 63.562(b)(3) and (4)). In addition, the following were removed:

§63.560(d) listed certain commodities that were exempt based on vapor pressures. This exemption does not apply, therefore the references to this exemption were removed wherever they occurred [§§63.562(b) and (c), §63.563(a)(4), § 63.565(l), § 63.567(j)].

§63.562(c)(1) required the RACT standard commencement of construction notification, which has been completed.

§63.563(b)(1) required an initial performance test, which has been completed. References to the initial performance test were removed wherever they occurred [§§63.563(a)(2) and (3); §63.563(b)(2), (b)(6), and (b)(9); § 63.565(b)(3); § 63.565(m)(2); § 63.567(f)]

The facility does not have combustion devices (except flare), therefore all references to combustion (except flare) and combustion devices (except flare) were removed from § 63.565(d).

The facility does not have carbon adsorbers with steam regeneration, therefore § 63.565(f), which requires baseline temperatures for this type of control device, was removed.

The facility does not have carbon absorbers, therefore § 63.565(k) was removed.

The facility has not reconstructed, therefore § 63.566 does not apply.

§ 63.567(b) required initial notifications, which have been completed.

§ 63.567(c) allowed a request for an extension of compliance, however the compliance date has passed.

### Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

45CSR21, Section 22 - Not applicable because Tri-State Terminal does not have gasoline truck loading facilities.

40 CFR 60, Subpart XX - Not subject because this facility does not have gasoline tank truck loading facilities.

40 CFR 63, Subpart ZZZZ - Marathon Ashland Petroleum does not operate any internal combustion engines subject to this MACT.

40 CFR 63, Subpart EEEE - No affected sources subject to the OLD MACT. Specifically, storage tanks that are subject to the Gasoline Distribution MACT are excluded from the OLD MACT. Other tanks are exempt due to true vapor pressure.

40 C.F.R. Part 82, Subpart F - The permittee has stated that it does no maintenance, service, repair, or disposal of appliances at the facility.

### **Request for Variances or Alternatives**

None.

### **Insignificant Activities**

Insignificant emission unit(s) and activities are identified in the Title V application.

### **Comment Period**

Beginning Date: August 9, 2010

Ending Date: September 8, 2010

All written comments should be addressed to the following individual and office:

Bobbie Scroggie  
Title V Permit Writer  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57th Street SE  
Charleston, WV 25304

### **Procedure for Requesting Public Hearing**

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

### **Point of Contact**

Bobbie Scroggie  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57th Street SE  
Charleston, WV 25304  
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